

April 10, 2002

Steve Teeters
Exopack, LLC
2200 D Avenue East
Seymour, Indiana 47274

Re: 071-15657-00028
Fourth Administrative Amendment to
FESOP 071-9061-00028

Dear Mr. Teeters:

Union Camp Corporation was issued a FESOP (F071-9061-00028) on March 26, 1998. Ownership of the source, after a merger with International Paper Company, was transferred September 29, 1999; at which time the source was identified as the International Paper - Seymour Flexible Packaging Plant. On July 31, 2001, the source received a second amendment signifying another change in ownership. On September 14, 2001, a request to change the source's name and responsible official was received. The name of the company was changed on the FESOP from *FPD Acquisition, Inc.* to *Exopack, LLC* at the same address. On December 27, 2001, Exopack, LLC submitted an application to the OAQ requesting to add two additional printing presses to their existing plant.

Pursuant to the provisions of 326 IAC 2-8-10(a)(14) the permit is hereby administratively amended as follows:

The FESOP has been modified to add two (2) additional flexographic printing presses, identified as PS5 and PS6, and to correct stack/vent information of the existing presses.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Flexoline 8 color flexographic printing press, constructed in 1986, identified as PS1, with a maximum line speed of 1200 feet per minute on ink or 400 feet per minute for ink and varnish, exhausting to **one (1) stack (S2) and two (2) vents (V3 and V4).** ~~three (3) stacks (S2, S3, and S4);~~
- (b) One (1) Flexoline 4 color flexographic printing press, constructed in 1988, identified as PS2, with a maximum line speed of 1100 feet per minute, exhausting to two (2) **vents (V5 and V6)** ~~stacks (S5 and S6);~~
- (c) One (1) Union Camp 2 color flexographic printing press, constructed in 1996, identified as PS3, with a maximum line speed of 500 feet per minute; ~~and~~
- (d) One (1) Advance Machine Technology one color flexographic printing press, constructed in 1989, identified as PS4, with a maximum line speed of 500 feet per minute;

- (e) **One (1) two-color, flexographic, “tail-end” printing press, identified as PS5, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V5; and**
- (f) **One (1) portable, two-color, flexographic, “tail-end” printing press, identified as PS6, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V6.**

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Flexoline 8 color flexographic printing press, constructed in 1986, identified as PS1, with a maximum line speed of 1200 feet per minute on ink or 400 feet per minute for ink and varnish, exhausting to **one (1) stack (S2) and two (2) vents (V3 and V4).** ~~three (3) stacks (S2, S3, and S4);~~
- (b) One (1) Flexoline 4 color flexographic printing press, constructed in 1988, identified as PS2, with a maximum line speed of 1100 feet per minute, exhausting to two (2) **vents (V5 and V6) stacks** ~~(S5 and S6);~~
- (c) One (1) Union Camp 2 color flexographic printing press, constructed in 1996, identified as PS3, with a maximum line speed of 500 feet per minute; ~~and~~
- (d) One (1) Advance Machine Technology one color flexographic printing press, constructed in 1989, identified as PS4, with a maximum line speed of 500 feet per minute.
- (e) **One (1) two-color, flexographic, “tail-end” printing press, identified as PS5, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V5; and**
- (f) **One (1) portable, two-color, flexographic, “tail-end” printing press, identified as PS6, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V6.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the volatile organic compound (VOC) in the inks and varnishes applied to the ~~four (4)~~ **six (6)** flexographic printing presses (**PS1 through PS6**) shall not exceed ninety-eight (98) tons per year.

D.1.3 Hazardous Air Pollutant (HAP) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the ~~four (4)~~ **six (6)** flexographic printing presses (PS1, PS2, PS3, ~~and PS4~~, **PS5, and PS6**) are limited to nine and four-tenths (9.4) tons of any single

hazardous air pollutant (HAP) emissions per year and twenty-four (24) tons of any combination of hazardous air pollutants (HAP) emissions per year.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of ~~this facility~~ **these facilities** are not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) and hazardous air pollutant (HAP) limits specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit. This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bob Sidner, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (703) 633-1701 to speak directly to Mr. Sidner. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/BS

cc: File - Jackson County
U.S. EPA, Region V
Jackson County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Exopack, LLC
2200 D Avenue East
Seymour, Indiana 47274**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F071-9061-00028	
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: March 25, 1998 Expiration Date: March 25, 2003

First Administrative Amendment 071-11219-00028, issued September 29, 1999
Second Administrative Amendment 071-14459-00028, issued August 21, 2001
Third Administrative Amendment 071-14953-00028, issued October 10, 2001

4 th Administrative Amendment 071-15657-00028	Pages Affected: 5, 26, and 33
Issued by: Original signed by Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: April 10, 2002

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary multiwall bag printing operation.

Responsible Official:	Steve Teeters
Source Address:	2200 D Avenue East, Seymour, Indiana 47274
Mailing Address:	2200 D Avenue East, Seymour, Indiana 47274
SIC Code:	2674
County Location:	Jackson
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Flexoline 8 color flexographic printing press, constructed in 1986, identified as PS1, with a maximum line speed of 1200 feet per minute on ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack (S2) and two (2) vents (V3 and V4);
- (b) One (1) Flexoline 4 color flexographic printing press, constructed in 1988, identified as PS2, with a maximum line speed of 1100 feet per minute, exhausting to two (2) vents (V5 and V6);
- (c) One (1) Union Camp 2 color flexographic printing press, constructed in 1996, identified as PS3, with a maximum line speed of 500 feet per minute;
- (d) One (1) Advance Machine Technology one color flexographic printing press, constructed in 1989, identified as PS4, with a maximum line speed of 500 feet per minute;
- (e) One (1) two-color, flexographic, "tail-end" printing press, identified as PS5, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V5; and
- (f) One (1) portable, two-color, flexographic, "tail-end" printing press, identified as PS6, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V6.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 0.667 million British thermal unit per hour (mmBtu/hr) natural gas-fired boiler, exhausting to one (1) stack (S1);

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Flexoline 8 color flexographic printing press, constructed in 1986, identified as PS1, with a maximum line speed of 1200 feet per minute on ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack (S2) and two (2) vents (V3 and V4);
- (b) One (1) Flexoline 4 color flexographic printing press, constructed in 1988, identified as PS2, with a maximum line speed of 1100 feet per minute, exhausting to two (2) vents (V5 and V6);
- (c) One (1) Union Camp 2 color flexographic printing press, constructed in 1996, identified as PS3, with a maximum line speed of 500 feet per minute;
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- (e) One (1) two-color, flexographic, "tail-end" printing press, identified as PS5, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V5; and
- (f) One (1) portable, two-color, flexographic, "tail-end" printing press, identified as PS6, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the volatile organic compound (VOC) in the inks and varnishes applied to the six (6) flexographic printing presses (PS1 through PS6) shall not exceed ninety-eight (98) tons per year.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the ink as it is applied to the substrate less water, shall contain sixty percent (60%) by volume or more nonvolatile material.

D.1.3 Hazardous Air Pollutant (HAP) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the six (6) flexographic printing presses (PS1, PS2, PS3, PS4, PS5, and PS6) are limited to less than nine and four-tenths (9.4) tons of any single hazardous air pollutant (HAP) emissions per year and twenty-four (24) tons of any combination of hazardous air pollutants (HAP) emissions per year.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities are not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) and hazardous air pollutant (HAP) limits specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Exopack, LLC
Source Address: 2200 D Avenue East, Seymour, Indiana 47274
Mailing Address: 2200 D Avenue East, Seymour, Indiana 47274
FESOP No.: F071-9061-00028
Facility: six (6) flexographic printing presses (PS1 through PS6)
Parameter: volatile organic compounds (VOC) and hazardous air pollutants (HAP)
Limit: 8.16 tons VOC per month = 16,320 pounds VOC per month; 0.78 tons HAP per month = 1,560 pounds HAP per month
YEAR: _____

Month	Coating Identi- fication	Coating usage (gal)	HAP content (lbs/gal)	Pounds HAP per month (Coating usage * HAP content)	Total pounds HAP per month	VOC content (lbs/gal)	Pounds VOC per month (Coating usage * VOC content)	Total pounds VOC per month

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____